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January 26, 1977

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Mr. George R. Alexander, Jr.
Regional Administrator
Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Mr. John Chicca
Air Policy Branch

Ronald Hausmann, Esq.
Office of General Counsel
Environmental Protection Agency
Washington, D.C. 20460

Re: Comments by The Hoover Company to Promulgated
Regulations of the Environmental Protection
Agency Dated August 27, 1976

Gentlemen:

Pursuant to agreement with Paul M. Kaplow, Esq., Counsel
to Respondent, Environmental Protection Agency, in Case No.
76-2281, United States Court of Appeals for the Sixth Circuit
enclosed please find substituted page 4 of written Comment supplied
by The Hoover Company on January 20, 1977. Please substitute
page 4 of such written Comment with the enclosed completed
information.

Yours very truly,

BLACK, McCUSKEY, SOUERS & ARBAUGH

By: 

VRM/jd

Enc.

with only the Hoover coal fuel fire boiler source (hereafter source No. 1). This run was designated "366 day run with Hoover source only". After the run was completed, the 20 days in which the sulfur dioxide receptor concentration readouts were the largest, were selected and another run of these twenty days was made. This run was designated "twenty days maximum concentration with major sources". An additional run was made and designated "twenty days maximum concentration with major sources and source No. 1 load correction". The first two program runs were made with source No. 1 using the Hoover coal fired boiler at maximum design load. The twenty-five major sources used in the last two runs comprise 92.5 percent of the total Stark County rated load and the source information was taken from the U.S.E.P.A. R.A.M. Model description. The 25 source limitation was due to the P.T.M.T.P. program capability. The load correction in the final run was made to provide actual load conditions of source No. 1.

From the computer readout the 39th day attained the maximum daily readout for the entire year. This concentration value was 131.2 ug/m³ or 35.9 percent of the 24 hour limit.

The computer readout for the 39th day was rerun to more closely determine the sulfur dioxide maximum concentration based on actual load conditions. The maximum sulfur dioxide concentration was 100.4 ug/m³ for 27.5 percent of the 24 hour limit. The average ambient temperature was 22 °F and the input heat was 40.5 percent of the rated input for both boilers as in the Urban R.A.M. Model. This rerun is a valid comparison of actual load conditions and will remain constant in the future. The heating load-process load ratio is to be the same on a year to year basis. ~~It is clear that the model predictions show no theoretical violation~~ of the federal ambient air quality standards when the Hoover source